

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| | | |
|-----------------------------------|---|---------------------|
| JAIMARIA BODOR, | : | CIVIL ACTION |
| Individually and on behalf of all | : | |
| others similarly situated, | : | |
| | : | |
| Plaintiffs | : | |
| v. | : | NO. 19-cv-5787(JMG) |
| | : | |
| MAXIMUS FEDERAL SERVICES, INC., | : | |
| | : | |
| Defendant | : | |

STATUS REPORT AND PROPOSAL (JOINT)

The parties, through counsel of record, submit this Joint Status Report and Proposal pursuant to the Court’s Order of October 8, 2021 (ECF 96), as amended by stipulation per the Court’s Order of October 29, 2021 (ECF 99). The Court has ordered the parties to meet and confer and submit a supplemental filing indicating which documents should remain sealed in accordance with the standards discussed in *In re Avandia Mktg., Sales Practices & Prods. Liab. Litig.*, 924 F.3d 662 (3d Cir. 2019).

After conferring, the parties have agreed that the documents previously filed under seal, including the Joint Appendix, can be unsealed in their entirety provided that certain information is redacted from the Joint Appendix. Both parties agree that Plaintiff’s sensitive financial and/or personal identifying information should be redacted per Federal Rule of Civil Procedure 5.2.¹

Defendant has agreed that only the “pricing information” shall be redacted from the Joint Appendix. Defendant is working diligently to finalize its review of the documents that it contends should be redacted. Plaintiff reserves the right to object to any of Defendant’s proposed redactions,

¹ Plaintiff has already identified the documents requiring redaction under this Rule, and these documents were identified in connection with the Declaration of Jody T. López-Jacobs dated February 19, 2021 at ¶ 4 (ECF 69).

and Defendant agrees that Plaintiff should have the opportunity to review the proposed redactions prior to agreeing to them. Accordingly, the parties propose the following procedure for the resolution of Defendant's proposed redactions:

1. Defendant will identify the information it desires to redact and provide the same to Plaintiff by 5:00 p.m. EST on Tuesday, November 9, 2021.
2. To the extent a dispute remains as to the propriety of any redactions, Defendant will submit the proposed redactions to the Court by Tuesday, November 16, 2021, and Plaintiff shall file its objections to the proposed redactions by Thursday, November 18, 2021.
3. Counsel shall file on ECF the unsealed documents, as redacted by agreement of the parties or decision of the Court (if necessary) no later than Friday, December 3, 2021.

Dated: 11/5/2021

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Dated: 11/5/2021

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APPROVED BY:

U.S.D.J., John M. Gallagher